

RYAN, PHILLIPS, UTRECHT & MACKINNON*

ATTORNEYS AT LAW

PROBATIONER PARTNER

1133 CONNECTICUT AVENUE, N.W.

SUITE 300

WASHINGTON, D.C. 20036

(202) 293-1177

FACSIMILE (202) 293-3411

WWW.RPUM.COM

November 22, 2002

*Via electronic filing to FEC and
U.S. Mail with attachment*

Ms. Jane Parks
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: HILLPAC (C00363994)
September Monthly Report (8/1/02 - 8/31/02)

Dear Ms. Parks:

I am writing on behalf of HILLPAC in response to a question raised by you concerning information contained in HILLPAC's September Monthly Report for the period August 1, 2002 through August 31, 2002 (the "September Report"). HILLPAC's response is set forth below:

1. Reattributed Contribution Properly Reported

HILLPAC complied fully with the Federal Election Campaign Act of 1971, as amended, (the "Act") and FEC regulations in handling and reporting the receipt and reattribution of the contribution questioned in your October 30, 2002 letter.

The receipt of the contribution in question was properly reported on HILLPAC's September Report and the reattribution was properly reported on its October Monthly Report. The answer to your question regarding how this particular contribution was reattributed is found in HILLPAC's October Monthly Report which was filed electronically with the FEC on October 20, 2002 -- ten days before the date of your letter.

Pursuant to the Act and FEC regulations, an individual may contribute \$5,000 per calendar year to a political committee. 2 U.S.C. §441a(f). If a committee receives a contribution that exceeds the limits it may retain the funds if within 60 days of receipt the excessive amount is properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution. 11 C.F.R. §110.1(k)(3). When itemizing a contribution that must be reattributed to correct an excessive amount, a committee is

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November 12, 2002

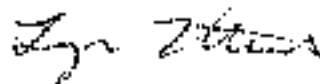
Page Two

instructed to include a statement noting that a reattribution has been requested. 11 C.F.R. §103.3(b)(5). In the report covering the period during which the reattribution is received, the committee must itemize as memo entries information on the contribution as it was previously disclosed and information on the contribution as it was reattributed, including the date the reattribution was received. 11 C.F.R. §104.8(d)(3).

On August 6, 2002, HILLPAC received a \$10,000 contribution from Michael J. Sherman. The contribution was properly reported on the September Report with a statement noting that a reattribution had been requested pursuant to 11 C.F.R. §103.3(b)(5). HILLPAC requested and obtained a reattribution authorization signed by each person making the contribution within 60 days of the date the original contribution was received pursuant to 11 C.F.R. §110.1(k)(3). A copy of the reattribution letter received by HILLPAC on September 27, 2002 and signed by Michael Sherman and Fran Sherman is attached. The September 27th reattribution was itemized on HILLPAC's October Monthly report that was filed with your agency on October 20, 2002.

We anticipate that this information sufficiently answers your question. If you need any additional information, please contact me at your convenience.

Sincerely,



Lyn Utrecht

Enclosure



509 2nd Street N.E. • Washington, DC 20002 • Tel: 202.675.8340 • Fax: 202.675.8350

Mr. and Mrs. Michael and Fran Sherman
333 East 68th Street
Apartment 13A
New York, NY 10021

Dear Michael and Fran:

Thank you for your generous credit card contribution of \$10,000 to HILLPAC. We greatly appreciate your support.

Under Federal law, however, HILLPAC is not permitted to accept contributions of more than \$5,000 per year from an individual. Spouses or joint account holders may make a joint contribution of \$10,000 per year to the PAC in a single check, but each spouse or joint account holder must sign either the check or another written instrument to verify that not more than \$5,000 of the joint contribution is attributed to each individual's \$5,000 per year limit.

In order to comply, you and your spouse or joint account holder may reattribute the excessive portion of the contribution to your spouse or joint account holder by signing this letter below and returning it to us in the enclosed postage-paid envelope. If you and your spouse or other joint account holder do not wish to reattribute the excessive amount, or if we do not receive the signed retribution within sixty (60) days of the date of receipt of the contribution, HILLPAC must refund the excessive portion of your contribution.

In addition, Federal law requires us to use our best efforts to collect and report the names, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year. Please help us comply by completing the information requested below and return this entire letter in the enclosed postage-paid envelope as soon as possible. You may also fax this letter back to us at (202) 675-8350.

Sincerely,

Amy J. Wills
Compliance Department

We hereby verify that the contribution described above was intended to be a joint contribution and should be reattributed as follows:

\$ 5,000
Amount Attributed to Individual

Michael Sherman
Name of Spouse or Joint Account Holder

Michael Sherman
Signature Required

President MJSherman & Assoc.
Occupation / Employer

\$ 5,000
Amount Attributed to Individual

Fran Sherman
Name of Spouse or Joint Account Holder

Fran Sherman
Signature Required

Artist/Self
Occupation / Employer

- Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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(6/2000)